

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

2 Martin Luther King Jr., Dr., Suite 1054 East, Atlanta, Georgia 30334

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Judson H. Turner, Director

November 13, 2013

COPY

VIA E-MAIL AND REGULAR MAIL

John F. Rowan, Sr. Item IV Trust
c/o Catherine Norris
P.O. Box 197
Carmel Valley, California 93924

Re: Voluntary Remediation Program Semi-Annual Status Report, June 2, 2012
Voluntary Remediation Program Semi-Annual Status Report, December 2, 2012
Voluntary Remediation Program Semi-Annual Status Report, June 2, 2013
Fashion Care/Executive Care Site, HSI No. 10786
2211 Savoy Drive, Chamblee, Dekalb County, Georgia
Tax Parcel ID Nos. 18-343-13-002, 18-343-13-005, 18-343-13-001, & 18-333-02-023

Dear Ms. Norris:

The Georgia Environmental Protection Division (EPD) has reviewed the above-referenced reports submitted by Winter Environmental in accordance with the Voluntary Remediation Program Act (the Act) for the above-referenced properties. EPD offers the following comments which should be addressed pursuant to the Act:

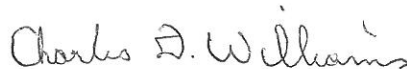
1. As noted in the Voluntary Remediation Program (VRP) application checklist and in EPD's December 2, 2010 VRP acceptance letter, the June 2, 2013 progress report should have included the final remedial plan. Although a draft plan is in place and the overall 5-year timeframe for submittal of the VRP compliance status report remains feasible, the necessary data collection and modeling to finalize that plan has not been completed. If the conceptual site model (CSM) changes, and active remediation becomes necessary, the schedule may be compromised. EPD encourages you to collect the necessary data and complete the modeling to finalize the CSM and remedial plan for inclusion in the June 2, 2014 progress report.
2. EPD concurs that horizontal delineation of groundwater is complete. Furthermore, vertical delineation of groundwater impacts to Type 1 risk reduction standards is not required for this site under Sections 12-8-107(g)(2) and 12-8-108(9) of the Act. However, a deep well is required to confirm conditions in the 'lower' aquifer in order to verify the CSM and support the model in accordance with EPD's December 2, 2010 (Comment 7) and February 22, 2012 (Comment 2) letters.
3. Based on Section 3.1 of the June 2013 Progress Report, EPD concurs that the probability of a complete exposure pathway on Tax Parcel 18-333-02-023 is minimal. Therefore, if appropriate language is added to the uniform environmental covenant (UEC) for Tax Parcel 18-343-13-002, a UEC for parcel 18-333-02-023 will not be required. In addition to the monitoring of property development proposed in Section 3.1, the UEC must commit to conducting vapor intrusion analysis, vapor intrusion mitigation, and/or groundwater corrective action, as appropriate, if enclosed structures are built in the vicinity of the plume. EPD recommends that the covenants be finalized after the CSM and remedial plan have been confirmed.

4. The vapor mitigation system proposed for the building on parcel 18-343-13-002 should be installed as soon as possible to ensure that there are no complete exposure pathways at this time.
5. The monitoring well network hasn't been sampled since July 2012 and many wells have only two or three data points. Therefore, EPD recommends that another round of sampling be completed for pertinent monitoring wells and for surface water prior to completing the required model.

The John F. Rowan, Sr. Item IV Trust (Trust) must address these comments to EPD's satisfaction in order to demonstrate compliance with the provisions, purposes, standards and policies of the Act. EPD may, at its sole discretion, review and comment on documents submitted by the Trust. However, failure of EPD to respond to a submittal within any timeframe does not relieve the Trust from complying with the provisions, purposes, standards and policies of the Act.

Please address the above comments in subsequent semi-annual progress reports. EPD anticipates receipt of the next report by December 2, 2013. If you have any questions, please contact Jason Metzger at (404) 657-8610.

Sincerely,



Charles D. Williams
Program Manager
Response and Remediation Program

c: Leonard Diprima, Jr., P.G., Winter Environmental
H.A. Rowan, Southern Automatic Company
Marvin Hewatt, Georgia-Alabama Commercial Investments, LLC
Joel Aultman, ASL Limited Partnership